

UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF MISSISSIPPI

RE: J. C. Sims

Case No. 20-10154

**OBJECTION TO CONFIRMATION OF  
DEBTOR'S FIRST CHAPTER 13 PLAN**

COMES NOW, the Creditor, Margaret Garrett, by and through the undersigned attorney, and files this Objection to Confirmation of Debtor's First Chapter 13 Plan and would respectfully show unto this Honorable Court, as follows:

1. Margaret Garrett is a secured creditor by virtue of a perfected security interest/deed of trust in the debtor's homestead.
2. A proof of claim will be filed. There is no escrow on the debtor's mortgage for land taxes or insurance.
3. The creditor is of information and belief that the debtor has not paid the 2018 and 2019 real estate taxes on the subject property and request that the land taxes be paid prior to confirmation.

WHEREFORE, PREMISES CONSIDERED, the Creditor prays that the Court will sustain the objection and deny Confirmation of the debtor's Chapter 13 Plan and for other relief the Court deems proper and equitable.

Respectfully submitted, this the 18th of March, 2020.

/s/ John Sherman  
John M. Sherman  
Attorney at Law  
Post Office Box 1900  
Clarksdale, MS 38614  
662-627-5301  
MSB #8807

**CERTIFICATE OF SERVICE**

I, John M. Sherman, Attorney at Law, do hereby certify that I have this day electronically filed the foregoing Creditor's Objection to Confirmation, with the Clerk of the Court using the ECF system which sent notification of such filing to the following:

Locke D. Barkley  
Chapter 13 Trustee  
6360 I-55 North, Suite 140  
Jackson, MS 39211  
[sbeasley@barkley13.com](mailto:sbeasley@barkley13.com)

U.S. Trustee's Office  
501 East Court Street, Suite 6-430  
Jackson, MS 39201  
[USTPRegion05.AB.ECF@usdoj.gov](mailto:USTPRegion05.AB.ECF@usdoj.gov)

Catherine Umberger  
Attorney for debtor  
[cu@mayfieldlawfirm.com](mailto:cu@mayfieldlawfirm.com)

This the 18<sup>th</sup> day of March, 2020.

**/s/ John M. Sherman**  
John M. Sherman